

# Exhibit A

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**From:** Laci Bonner [<mailto:Laci.Bonner@butlersnow.com>]

**Sent:** Monday, July 18, 2016 3:23 PM

**To:** Fitzpatrick, Fidelma <[ffitzpatrick@motleyrice.com](mailto:ffitzpatrick@motleyrice.com)>; Crum, John <[jcrum@motleyrice.com](mailto:jcrum@motleyrice.com)>

**Cc:** Scudder-Levin, Jennie <[jlevin@motleyrice.com](mailto:jlevin@motleyrice.com)>; McKinney, Kelly-Ann <[kmckinney@motleyrice.com](mailto:kmckinney@motleyrice.com)>; Qunell, Colleen <[cqunell@motleyrice.com](mailto:cqunell@motleyrice.com)>; Donna Jacobs <[Donna.Jacobs@butlersnow.com](mailto:Donna.Jacobs@butlersnow.com)>

**Subject:** RE: Motions for Extension of Daubert Deadline Attached

Fidelma,

There were only four motions attached to John's emails from earlier today, which we have approved:

Flynn (Burnett)  
Grier (Lambert & Lewis)  
Sirls (General)

Please send copies of the others with requested changes and we will review.

Thank you,

**Laci Bonner**

*Contract Attorney*

(601) 985-4474

[Laci.Bonner@butlersnow.com](mailto:Laci.Bonner@butlersnow.com) | [vCard](#)

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**From:** Fitzpatrick, Fidelma [<mailto:ffitzpatrick@motleyrice.com>]  
**Sent:** Monday, July 18, 2016 2:21 PM  
**To:** Laci Bonner; Crum, John  
**Cc:** Scudder-Levin, Jennie; McKinney, Kelly-Ann; Qunell, Colleen; Donna Jacobs  
**Subject:** RE: Motions for Extension of Daubert Deadline Attached

Laci-

To confirm – we are requesting extensions on each of the following to 10 days following the deposition:

Bergmann (Anderson & Peterson Cases)  
Flynn (Burnett)  
Grier (Lambert & Lewis)  
Karram (Morrison)  
Longacre (Shelton)  
McLendon (Johnson & Martin)  
Sirls (General & Lambert)  
Thames (Shelton, Martin & Johnson)  
Wright (Johnson, Swanson & Martin)

The reason for each is the same – the depositions are occurring close to or after the Daubert deadline.

Please confirm that you are not opposing and we will draft motions in each.

Thank you.

**Fidelma L. Fitzpatrick** | Attorney at Law | Motley Rice LLC  
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o. 401.457.7728 x7728 | c. 401.374.7685 | f. 401.457.7708

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**From:** Laci Bonner [<mailto:Laci.Bonner@butlersnow.com>]  
**Sent:** Monday, July 18, 2016 2:47 PM  
**To:** Crum, John <[jcrum@motleyrice.com](mailto:jcrum@motleyrice.com)>

**Cc:** Fitzpatrick, Fidelma <[ffitzpatrick@motleyrice.com](mailto:ffitzpatrick@motleyrice.com)>; Scudder-Levin, Jennie <[jlevin@motleyrice.com](mailto:jlevin@motleyrice.com)>; McKinney, Kelly-Ann <[kmckinney@motleyrice.com](mailto:kmckinney@motleyrice.com)>; Qunell, Colleen <[cqunell@motleyrice.com](mailto:cqunell@motleyrice.com)>; Donna Jacobs <[Donna.Jacobs@butlersnow.com](mailto:Donna.Jacobs@butlersnow.com)>

**Subject:** RE: Motions for Extension of Daubert Deadline Attached

John,

Thank you for making the requested changes. While the specific reply dates are included in the proposed order, we would request that those dates also be included in the body of the motions.

Thank you,

**Laci Bonner**

*Contract Attorney*

(601) 985-4474

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**From:** Crum, John [<mailto:jcrum@motleyrice.com>]

**Sent:** Monday, July 18, 2016 11:14 AM

**To:** Laci Bonner

**Cc:** Fitzpatrick, Fidelma; Scudder-Levin, Jennie; McKinney, Kelly-Ann; Qunell, Colleen

**Subject:** FW: Motions for Extension of Daubert Deadline Attached

Laci,

Attached are the proposed Motions for extension of time for Daubert deadlines with the changes you requested in the email below and the specific dates provided for your replies per your agreement with Jennie Scudder-Levin. Please review and if the changes meet your approval we will file today.

Thank you,

**John Crum** | Paralegal | Motley Rice LLC

28 Bridgeside Blvd. | Mt. Pleasant, SC 29464

o. 843.216.9033 | f. 843.216.9450 | [jcrum@motleyrice.com](mailto:jcrum@motleyrice.com)

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**From:** Scudder-Levin, Jennie

**Sent:** Monday, July 18, 2016 11:16 AM

**To:** Crum, John <[jcrum@motleyrice.com](mailto:jcrum@motleyrice.com)>

**Subject:** FW: Motions for Extension of Daubert Deadline Attached

**Jennie Scudder-Levin** | Attorney At Law | Motley Rice LLC

28 Bridgeside Blvd. | Mt. Pleasant, SC 29464

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**From:** Laci Bonner [<mailto:Laci.Bonner@butlersnow.com>]  
**Sent:** Friday, July 15, 2016 5:40 PM  
**To:** Fitzpatrick, Fidelma <[ffitzpatrick@motleyrice.com](mailto:ffitzpatrick@motleyrice.com)>; Donna Jacobs <[Donna.Jacobs@butlersnow.com](mailto:Donna.Jacobs@butlersnow.com)>  
**Cc:** McKinney, Kelly-Ann <[kmckinney@motleyrice.com](mailto:kmckinney@motleyrice.com)>; Scudder-Levin, Jennie <[jlevin@motleyrice.com](mailto:jlevin@motleyrice.com)>  
**Subject:** RE: Motions for Extension of Daubert Deadline Attached

Fidelma,

Since the Grier depositions went forward as scheduled on July 13, 2016, can we please take out the language, "or by ten (10) days from the date of deposition if it is not, in fact, completed on July 13, 2016 as currently scheduled."?

Additionally, the Flynn cases did not go forward as scheduled for July 14<sup>th</sup>, but the new date of July 21, 2016, has been confirmed.

Finally, we would request that the motions provide that we get equal time extensions on the responses, with the specific date provided. This agreement is reflected in the email correspondence with Jennie from yesterday that is attached.

Thank you,

**Laci Bonner**

*Contract Attorney*

(601) 985-4474

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**From:** Fitzpatrick, Fidelma [<mailto:ffitzpatrick@motleyrice.com>]  
**Sent:** Friday, July 15, 2016 2:31 PM  
**To:** Laci Bonner  
**Cc:** McKinney, Kelly-Ann; Scudder-Levin, Jennie  
**Subject:** FW: Motions for Extension of Daubert Deadline Attached

Laci – attached are the motions for extensions of Daubert deadlines. Please confirm that these reflect our agreement so that we can file.

**Fidelma L. Fitzpatrick** | Attorney at Law | Motley Rice LLC  
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**From:** Scudder-Levin, Jennie  
**Sent:** Thursday, July 14, 2016 5:51 PM  
**To:** Thompson, Fred <[fthompson@motleyrice.com](mailto:fthompson@motleyrice.com)>; Fitzpatrick, Fidelma <[ffitzpatrick@motleyrice.com](mailto:ffitzpatrick@motleyrice.com)>  
**Cc:** McKinney, Kelly-Ann <[kmckinney@motleyrice.com](mailto:kmckinney@motleyrice.com)>  
**Subject:** FW: Motions for Extension of Daubert Deadline Attached

Attached, please find motions for extensions of Daubert motions for all cases regarding Flynn, Grier, Sirls, Thames, and Bergman.

**Jennie Scudder-Levin** | Attorney At Law | Motley Rice LLC  
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